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The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

BY ECF AND FACSIMILE TO (212) 805-6724

Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570-GBD-FM

Dear Judge Maas:

We write on behalf of defendant Dallah Avco to request an extension of time for its response to plaintiffs' motion to compel (Dkt. 3211), currently due February 29, 2016. Dallah Avco respectfully requests a 60-day extension to April 29, 2016. Plaintiffs' motion addresses a number of issues, and undersigned counsel require additional time to consult and coordinate with our client overseas to prepare the response. In addition, as referenced in plaintiffs' motion and the attached exhibits, the parties have been engaged in an ongoing meet and confer process in an effort to narrow our differences and thereby reduce the number of issues raised by the motion that the Court will have to address. An extension will allow that process to continue with a view to narrowing the issues requiring resolution by the Court. This is Dallah Avco's first request for an extension of this deadline.

Plaintiffs have advised that they consent to the requested extension. Thank you for your time and attention to this matter.

Respectfully submitted,



Robert Kry

cc: all counsel by ECF